

Nevada Bar No. 9220
Sydney R. Gambee, Esq.
Nevada Bar No. 14201
HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, NV 89134
Phone: 702-222-2500
Fax: 702-669-4600
Email: JGWent@hollandhart.com
SRGambee@hollandhart.com

Attorneys for Defendant Synchrony Lending, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RAMON OCHOA,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES,
LLC; LEXISNEXIS RISK SOLUTIONS,
INC.; FIRST ELECTRONIC BANK; AND
SYNCHRONY LENDING, INC.,

Defendants.

Case No. 2:18-cv-01343-GMN-CWH

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE RESPONSE
TO COMPLAINT**

[THIRD REQUEST]

COME NOW Plaintiff Ramon Ochoa ("Plaintiff") and Defendant Synchrony Bank ("Synchrony"), by counsel and pursuant to Local Rules 6-1 and 7-1, stipulate as follows:

STIPULATION

1. On July 20, 2018, Plaintiff filed a Complaint with this Court [ECF No. 1].
2. Synchrony was served with the Complaint on July 25, 2018.
3. Synchrony's response to the Complaint was originally due by August 15, 2018.
4. On August 15, 2018, counsel for Synchrony and Plaintiff jointly stipulated to extending Synchrony's deadline to file a response to the Complaint to September 5, 2018.
5. On August 17, 2018, the Court entered an Order granting the parties' joint stipulation [ECF No. 12].
6. On September 5, 2018, counsel for Synchrony and Plaintiff jointly stipulated to extending Synchrony's deadline to file a response to the Complaint to September 19, 2018.

1 7. On September 6, 2018, the Court entered an Order granting the parties' joint
2 stipulation [ECF No. 14].

3 8. The Parties continue to engage in preliminary discussions in this matter. In
4 particular, counsel for the parties have had discussions regarding settlement, Synchrony's
5 intention to file a Motion to Dismiss if the case cannot be resolved, and the need for discovery in
6 the event a Motion to Dismiss is not granted.

7 9. In order to continue to explore the possibility of early resolution of the case,
8 counsel for Synchrony desires an extension until October 10, 2018 to file a response to the
9 Complaint.

10 10. Counsel for Synchrony conferred with counsel for the Plaintiff regarding this
11 Stipulation. Counsel for the Plaintiff does not oppose this requested extension.

12 11. The requested extension will allow the Parties time to potentially negotiate a
13 resolution of this matter.

14 12. This Stipulation is filed in good faith and not for dilatory or other improper
15 purpose. Plaintiff would not suffer any prejudice by the Court permitting Synchrony the
16 requested extension of time and has consented to the requested extension.

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

13. Granting this Stipulation is in the interests of justice and is otherwise right and proper.

DATED: September 18, 2018.

DATED: September 18, 2018.

/s/ Sydney R. Gambiae

Sydney R. Gambiae, Esq. (NV Bar No. 14201)
Holland & Hart LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, NV 89134

Counsel for Defendant Synchrony Bank

/s/ Michael Kind


Michael Kind, Esq. (NV Bar No. 13903)
Kazerouni Law Group, APC
6069 South Fort Apache Road, Suite 100
Las Vegas, NV 89148

David H. Krieger, Esq. (NV Bar No. 9086)
HAINES & KRIEGER, LLC
8985 S. Eastern Avenue, Suite 350
Henderson, Nevada 89123

Counsel for Plaintiff Ramon Ochoa

IT IS SO ORDERED.

Dated this 18 day of September, 2018.


Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT COURT